

REMARKS

In an Office Action mailed on December 21, 2005, an objection was made to claim 48; claims 1-3, 10, 11, 17-20, 48 and 49 were rejected under 35 U.S.C. § 102(e) as being anticipated by Snider; claims 4-6, 8, 12, 24, 25, 29-31 and 45-47 were rejected under 35 U.S.C. § 103(a) as being unpatentable over Snider; claims 30, 31, 50 and 51 were rejected under 35 U.S.C. § 103(a) as being unpatentable over Snider in view of Rayssiguier; and claims 7, 9, 13-16, 21-23 and 26-28 were objected to as being dependent upon rejected base claims but were indicated as being allowable if rewritten in independent form.

Claim 48 has been amended to remove the reference to the language "production tubing," thereby overcoming the objection to this claim.

Newly-added independent claim 61 contains limitations from claim 14, a claim that has been indicated as being allowable by the Examiner. In particular, newly-added claim 61 recites running a casing into a wellbore of a well, running a tool into the casing and fixing the tool to the well with a fixing agent without pumping the fixing agent through a central passageway of the tool. It is noted that Snider fails to teach or suggest running a tool into a casing, as Snider's perforating gun assembly 20 is mounted to the outside of a casing 12. Therefore, for at least this reason, allowance of newly-added claims 61-63 is requested.

Newly-added claim 64 depends from independent claim 1, which overcomes the § 102 rejections for the reasons that are set forth below.

Claim 7, indicated as being allowable if rewritten in independent form by the Examiner, has been rewritten in independent form as newly-added claim 65. The changes from original claim 7 are 1.) claim 65 has a preamble that recites, "a method comprising" instead of "a method to install a tool in a well, comprising"; and 2.) claim 64 now recites, "running a tool into a well." Therefore, Applicant requests allowance of claims 65-69.

Claim 9 has been rewritten in independent form as newly-added independent claim 70, with the following additional changes: 1.) the preamble language "a method to install a tool in a well" has been changed to recite "a method usable with a well"; and 2.) line 2 has been changed to state, "running a tool into the well." Because claim 9 was indicated as being allowable if rewritten in independent form, Applicant requests allowance of newly-added claims 70-73.

Newly-added independent claim 74 contains limitations from dependent claim 22, which has been indicated as being allowable by the Examiner. Newly-added claim 74 recites running a

tool into a well and recites that the tool is part of a perforating gun string. The method of claim 74 includes using the perforating gun string as a production tubing. For at least the reason that Snider fails to teach or suggest using a perforating gun string as a production tubing, allowance of claims 74-78 is requested.

As amended, the method of independent claim 1 includes running a tool into an uncased interval of the well and using the tool to support the interval as a casing. The method of claim 1 also recites fixing the tool to the well with a fixing agent without pumping the fixing agent through a central passageway of the tool.

Contrary to the limitations of amended independent claim 1, Snider discloses a perforating assembly 20 that is attached to the outside of a casing 12 and is run downhole with the casing 12. Snider fails to teach or suggest using the perforating gun assembly 20 or any other tool as a casing and furthermore, fails to teach or suggest fixing such a tool to a well with a fixing agent without pumping the fixing agent through a central passageway of the tool. Therefore, for at least these reasons, amended independent claim 1 overcomes the § 102 rejection in view of Snider.

Claims 2 and 4-6 are patentable for at least the reason that these claims depend from an allowable claim.

As amended, the method of independent claim 17 includes running a tool into a well via a string and introducing a fixing agent into the well after the running so that the fixing agent at least partially surrounds the tool. The method includes operating the tool after the fixing agent sets and using at least part of the string as a production tubing.

Contrary to the limitations of amended independent claim 17, Snider discloses a control system 18, such as an electric line, for purposes of igniting its perforating gun assembly 20. *See, for example* Snider, 6:21-26. The control system 18 is not a production tubing. Furthermore, Snider fails to teach or suggest using at least part of a string, as set forth in claim 17, as a production tubing. Therefore, Applicant submits that amended independent claim 17 overcomes the § 102 rejection in view of Snider.

Claims 18-21 are patentable for at least the reason that these claims depend from an allowable claim.

Independent claim 45 recites a tool that is set in a fixing agent. As amended, independent claim 45 recites that the tool is adapted to line a wellbore of the well as a casing and has a

bottom end that is sealed to prevent a fixing agent from entering the tool before the fixing agent is set.

Contrary to the limitations of amended independent claim 45, Snider fails to teach or suggest a tool that is set in a fixing agent and lines a wellbore of a well as a casing. Instead of such an arrangement, Snider discloses a perforating gun assembly 20 that is attached to the outside of a casing 12. The perforating gun string assembly 20 does not, however, line a wellbore or serve as a casing of a well. Thus, Snider fails to teach or suggest the limitations of amended independent claim 45.

Claims 46 and 47 are patentable for at least the reason that these claims depend from an allowable claim.

The system of independent claim 48 includes a fixing agent and a perforating gun string that is set in the fixing agent. As amended, the system of independent claim 48 recites that the perforating gun string is adapted to communicate produced well fluid to the surface of the well.

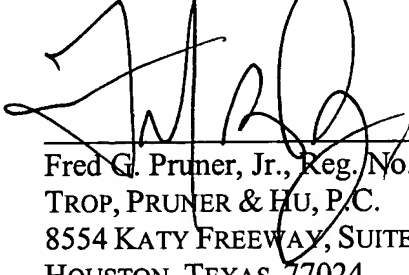
Contrary to the limitations of amended independent claim 48, Snider teaches a control means 18 that is attached to the perforating gun assembly 20. As discussed above, the control system 18 may be an electric line for purposes of activating the perforating gun assembly 20. However, there is no teaching or suggestion in Snider that the perforating gun assembly 20 is part of a perforating gun string that is adapted to communicate produced well fluid to the surface of a well. Therefore, for at least this reason, amended independent claim 48 overcomes the § 102 rejections.

Claims 49-51 are patentable for at least the reason that these claims depend from an allowable claim.

CONCLUSION

In view of the foregoing, withdrawal of the §§ 102 and 103 rejections and a favorable action in the form of a Notice of Allowance are requested. The Commissioner is authorized to charge any additional fees or credit any overpayment to Deposit Account No. 20-1504 (SHL.0240US).

Respectfully submitted,



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